

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S MOTION FOR LEAVE TO
SUBSTITUTE CORRECTED GHOST
WRITING FORM

**DEFENDANT'S MOTION FOR LEAVE TO SUBSTITUTE CORRECTED GHOST
WRITING FORM**

Comes now Defendant Jason Goodman, Pro Se, with this Motion For Leave to Substitute Corrected Ghost Writing Form. Due to the deliberately convoluted, defamatory and obstructionist nature of Plaintiff's numerous filings, coupled with the long period of recent inactivity in this suit, and comparatively short 10 day period given to respond to the Court's Order, Defendant Goodman improperly recalled certain details related to the filing of the Answer (ECF No.14). Defendant's Answer was originally filed more than one year ago on October 6, 2017. Since that time, and in addition to filing seven Declarations in this action, D. George Sweigert has initiated a remarkably similar SLAPP action based largely on Plaintiff's same false allegations. D. George Sweigert's concurrent action was first brought in U.S. District Court in the Southern District of South Carolina, on June 14, 2018 nearly simultaneous with his Seventh Declaration (ECF No. 60). Sweigert's action was reassigned to the U.S. District Court in the Southern District of New York (1:18-cv-08653-VEC) September 21, 2018. Currently in that matter, U.S. District Judge Valerie E. Caproni has issued Plaintiff Sweigert an Order To Show

DEFENDANT'S MOTION FOR LEAVE TO SUBSTITUTE CORRECTED GHOST WRITING FORM - 1

1 Cause which remains unresolved at this time. Upon further consideration and review of emails
2 from October 2017 related to the filing of Defendant's Answer (ECF No. 14), Defendant would
3 like to amend the Ghost Writing Form associated with the filing of the Defendant's Answer
4 (ECF No. 14).
5

6 1. Defendant had communications via telephone and email with Susan Lutzke, aka Susan
7 Holmes, aka Queen Tut (Lutzke). Lutzke worked with Defendant Goodman to formulate
8 and write the Answer (ECF No. 14). In addition to Lutzke, an individual known to
9 Defendant as William McGill (McGill) also communicated by email and telephone with
10 regard to writing the Answer (ECF No. 14). No money was exchanged among any of the
11 parties or Defendant. Defendant has not ever met either of the two parties. Defendant
12 has only communicated with Lutzke and McGill by telephone and email. To the best of
13 Defendant's knowledge Lutzke is not an attorney and Lutzke never told Defendant that
14 she was an attorney. To the contrary, Lutzke specifically told Defendant she was not an
15 attorney. McGill did tell Defendant by email and / or telephone that he was an attorney,
16 but Defendant did not verify this nor did Defendant retain McGill as his attorney in any
17 matter at any time. No retainer agreement oral or written has been entered or signed. No
18 money has been exchanged between Defendant and McGill. To the best of Defendant's
19 knowledge, McGill does not practice law in VA. McGill offered his time and input as
20 mere suggestions and he did so of his own free will with no expectation or demand of any
21 form of compensation in return.
22

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24
25 2. Defendant has no interest in wasting the Court's valuable time and resources. The need
26 to answer Pro Se is put upon Defendant by Plaintiff's abusive SLAPP action. However,
27 should the Court require further clarification on this matter, Defendant may provide all
28 communications via email between Defendant and Lutzke, Defendant and McGill as well

1 as group emails between Defendant, Lutzke and McGill. McGill's input in writing the
2 Answer (ECF No. 14) was limited to corrections in the document written by Lutzke and
3 Goodman formatting, suggestions and syntax. The substantial majority of the Answer
4 (ECF No. 14) was written by Lutzke with additional input from Goodman.
5

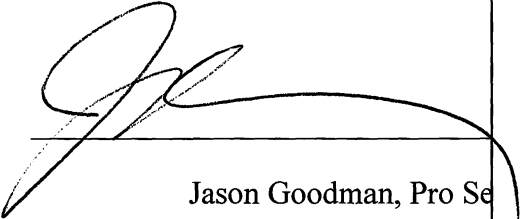
6 3. The Answer (ECF No. 14) was originally filed on October 6, 2017. Between this time
7 and the April 13, 2018 filing of the Plaintiff's Amended Complaint, Plaintiff's tactics had
8 become clear to Defendant. For the Answer to Plaintiff's Amended Complaint (ECF No.
9 44) filed April 30, 2018, Defendant did not seek or utilize assistance from Lutzke, McGill
10 or any other Attorney.
11

12 4. By Plaintiff's own admission, he is a retired CIA Clandestine Case Officer. He has made
13 numerous public admissions of his own involvement in "False Flag" operations in which
14 he deliberately deceived targets into thinking actions had been taken by parties other than
15 those actually operating. The use of infiltration and "Double Agents" is a well-known
16 common practice of clandestine services. It is not unreasonable to anticipate Plaintiff is
17 acting in this manner with regard to this action. In the filing of Defendant's Motion to
18 Sever (ECF No. 46) Plaintiff's use of infiltration tactics is referenced. In suspicion of
19 this, Defendant prepared all proceeding filings with no assistance.
20
21

22 Defendant humbly apologizes to the court for the inadvertent error which necessitated this
23 Motion for Leave. Due to the excessive, defamatory, baseless and voluminous filings from
24 both Steele and Sweigert, requiring an inordinate amount of time, attention and effort from
25 Defendant, the detail of this inconsequential communication with McGill was temporarily
26 overlooked. Upon closer review of communications, and this substitute corrected Ghost
27
28

1 Writing form, the docket will now be correct, and the record will reflect a fully accurate
2 portrayal of events related to the filing of the initial Answer (ECF No. 14).
3

4 Respectfully submitted
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Jason Goodman, Pro Se

9 252 7th Avenue Apt 6s
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11 New York, NY 10001

12 truth@crowdsourcethetruth.org
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

Civil Action Number: 3:17-cv-00601-MHL

JASON GOOMDAN

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of _____.
(Title of Document)

Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)

OR

The following attorney(s) prepared or assisted me in preparation of ANSWER (ECF No. 14).
(Title of Document)

WILLIAM MCGILL

(Name of Attorney)

UNKNOWN

(Address of Attorney)


(214) 276-6004

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

JASON GOODMAN

(Name of *Pro Se* Party (Print or Type)



Signature of *Pro Se* Party

Executed on: FEBRUARY 11, 2019 (Date)

Circuit Court for RichmondCase No. 3:17cv601-MHL

City or County

Robert David Steele, et al.,

Jason Goodman

Name

Name

11005 LANGTON ARMS CT

252 7th ave

6s

Street Address

Apt. #

Street Address

Apt. #

OAKTON, VA 22124 (571) 320-8573

New York NY 10001 (323) 744-7594

City State Zip Code Area Code Telephone

City State Zip Code Area Code Telephone

Plaintiff

Defendant

CERTIFICATE OF SERVICE

(DOM REL 58)

I HEREBY CERTIFY that on this 11 day of February, 2019, a copy
of the document(s) entitled DEFENDANT'S MOTION FOR LEAVE TO SUBSTITUTE CORRECTED GHOST WRITING FORM
Title of Document(s)
was/were mailed, postage prepaid to:

Steven Biss

Opposing Party or His/Her Attorney

via email - stevenbiss@earthlink.net

Address

City

State

Zip

February 11, 2019

Date

Signature

